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10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA

12 VICKI J. AZNARAN and RICHARD N.)
 13 AZNARAN,)
 14 Plaintiffs,)
 15 vs.)
 16 CHURCH OF SCIENTOLOGY OF)
 17 CALIFORNIA, INC., CHURCH OF)
 18 SPIRITUAL TECHNOLOGY, INC.,)
 19 SCIENTOLOGY MISSIONS INTERNATIONAL,)
 20 INC., RELIGIOUS TECHNOLOGY CENTER,)
 21 INC., AUTHOR SERVICES, INC. CHURCH)
 22 OF SCIENTOLOGY INTERNATIONAL, INC.)
 23 CHURCH OF SCIENTOLOGY OF LOS)
 24 ANGELES, INC., MISSION OFFICE)
 25 WORLDWIDE, AUTHOR FAMILY TRUST,)
 26 THE ESTATE OF L. RON HUBBARD,)
 27 DAVID MISCAVIAGE, and NORMAN)
 28 STARKEY,)
 Defendants.)

Case No. : CV-88-1786-
 JMI (Ex)
 Date: September 26, 1988
 Time: 10:00 a.m.
 Courtroom: Honorable James
 H. Ideman

AMENDED DECLARATION OF-
 VICKI J. AZNARAN IN
 OPPOSITION TO PLAINTIFFS'
 MOTION FOR SANCTIONS.

DECLARATION OF VICKI J. AZNARAN

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2
3 I, Vicki J. Aznaran declare as follows:

4 1. I am one of the plaintiffs in the within action.

5 2. I was a member of the Scientology Cult from
6 November of 1973 until April, 1987.

7 3. From 1975 until April 1987, I was a staff member of
8 various organizations controlled by the Scientology Cult. Among
9 those staff positions was the presidency of Religious Technology
10 Center, a California corporation. In my capacity as president, I
11 became familiar with the interlocking corporate structures of the
12 various organizations controlled by the Scientology cult.

13 4. I also became familiar with the policy known as
14 "fair game." "Fair game" is a policy whereby those who are
15 declared to be "suppressive" persons are subject to any form of
16 intimidation, harassment, or oppression by any Scientologist.

17 5. I have seen a policy letter written by
18 L. Ron Hubbard, the founder of Scientology, which ordered that the
19 words "fair game" no longer be used because of negative public
20 relations implications, but the policy letter continues to
21 indicate that "suppressive" persons are to be treated in the same
22 way as previously. I have witnessed the application of "fair
23 game" over the years of my membership in the cult and in positions
24 of responsibility within the Scientology Cult, and I know that it
25 was still applied to "enemies" of the cult even after its public
26 disavowal.

27 6. Even after leaving the Scientology Cult in April of
28 1987, my husband Richard and I tried very hard to avoid becoming

1 "fair game." We were told that we had to maintain contact with
2 the Scientology organizations and that Mark Rathbun would be
3 contacting us regularly. Mr. Rathbun did contact us on a regular
4 basis and we contacted him according to his instructions.

5 7. Even as late as November or December of 1987, my
6 husband and I were contacted by Mr. Rathbun and told not to talk
7 to reporters from the Los Angeles Times. Mr. Rathbun made it
8 clear that we would be declared "suppressives" if we did not
9 continue to cooperate.

10 8. It was not until early 1988, that I became
11 determined to resist the efforts of the Scientology Cult to have
12 me lie about matters which had occurred during my tenure as a
13 member of the staff of Religious Technology Center.

14 9. In February 1987, I was working for the Scientology
15 Cult at Gilman Hot Springs. In the latter part of that month, I
16 was forced to go to the Rehabilitation Project Force at "Happy
17 Valley." I was roused out of bed early in the morning after
18 having worked late into the night before, and I was ordered to go
19 to my office. David Miscavige was there along with Norman
20 Starkey, Greg Wilhere, Ray Mithoff, and several other uniformed
21 men. Mr. Miscavige ordered me to write an order assigning myself
22 to the Rehabilitation Project Force. Mr. Miscavige told me that
23 if I didn't he would write it and would fill it full of libelous
24 statements about me. He said that because of his high position
25 within the cult, his statements would be believed, and my standing
26 and reputation within Scientology would be destroyed.

27 10. I was kept up all day and late into the night,
28 being interrogated by one person after another. Because of the

1 presence of several persons, I felt that any attempt to escape
2 would be futile. I was watched at all times during the
3 interrogation. There is an eight-foot fence topped by barbed wire
4 surrounding the compound where I was being held, with guards
5 posted at the gates.

6 11. After my interrogation, I was taken into a car with
7 three other people who were to guard me, and I was transported to
8 "Happy Valley." "Happy Valley" is a piece of property owned by
9 Scientology. It is about 10 miles from the Gilman Hot Springs
10 Cult Headquarters. It is located just past the Soboba Indian
11 Reservation about three miles down a dirt road into the rocky
12 foothills. It is rocky semi-desert country and is very isolated.
13 I felt that any attempt to escape from "Happy Valley" would be
14 futile.

15 12. During my stay at the Rehabilitation Project Force
16 at "Happy Valley," I slept in a tin shed which had no air
17 conditioning or heating. The shed had a bare wood floor and it
18 was terribly cold at night and miserably hot during the day. The
19 first night that I was there, I was forced to sleep on the floor,
20 as there was no bunk for me. It was a small room with 12 to 14
21 women who slept in it.

22 13. During my stay at the Rehabilitation Project Force,
23 I was required to do hard physical labor from 6:30 a.m. until
24 5:30 p.m. The meals consisted of either beans and rice or
25 leftovers from the food served to other staff working at the
26 Rehabilitation Project Force. I was not allowed to walk, but
27 rather required to run everywhere I went in the compound.

28 14. I was guarded the whole time I was in the

1 Rehabilitation Project Force. I was not allowed to go to the
2 restroom alone. I was not allowed to shower alone. At night I
3 was locked in a room that had heavy bunk beds with people sleeping
4 in them and which were pulled in front of the doors. I repeatedly
5 requested to be able to contact my husband by phone and letter,
6 and this was denied. During March, 1987 I asked David Miscavige
7 that I be put in touch with my husband. Mr. Miscavige tried to
8 make me believe that my husband did not want to communicate with
9 me and had "written me off." As a result of these statements, I
10 felt isolated from my husband and a sense of despair about ever
11 seeing him again or continuing with our relationship.

12 15. On March 31, 1987 two of the men in the
13 Rehabilitation Project Force whom I knew, Jesse Prince and
14 David Bush, escaped from the Rehabilitation Project Force. They
15 ran out of the front gate and were pursued down the road toward
16 the Indian reservation by guards and two others. I was later told
17 that two men in a pickup truck drove by and slowed down... They
18 asked Mr. Prince and Mr. Bush if they would like a ride. They
19 climbed in the back. They were transported in the pickup truck
20 into town to a rental car place where Mr. Prince rented a car.
21 They then drove back to Happy Valley to get me.

22 16. At that time I was lying under a tree on a hill, as
23 I was sick with a fever and had been told that I could not see a
24 doctor until Mr. Miscavige gave his permission. I had been sick
25 for a week. The tin building where we slept was too hot during
26 the day to sleep in and that was why I was sent to lie down under
27 a tree.

28 17. Mr. Prince and Mr. Bush opened the front gate and

1 drove up close to where I was under the tree. Another person at
2 the Rehabilitation Project Force named Chris Byrnes was with me to
3 keep me from going with them. There were at least four security
4 guards equipped with radios and motorcycles, attempting to
5 maneuver into a position where they could prevent us from leaving
6 the compound. As I got up to leave, Mr. Byrnes grabbed my arm in
7 an attempt to keep me from leaving. I pulled loose and ran to the
8 car and got in the back seat. We then drove out the front gate,
9 which Mr. Prince had left open when he drove into the compound.

10 18. When I left "Happy Valley," I did not know where my
11 husband was located. When one spouse leaves Scientology, it is
12 the practice to get the other spouse to divorce them. I knew that
13 Mr. Miscavige had been telling me that my husband "probably didn't
14 care about me or want to hear from me." I knew that Mr. Miscavige
15 would try to get Richard to leave me and would tell Richard that I
16 was insane and that Richard needed to divorce me. Richard had
17 been working in various Scientology locations since December,
18 1985. Sometimes I would know what locations he was in and
19 sometimes I would not.

20 19. After leaving "Happy Valley," Mr. Bush, Mr. Prince,
21 and I drove around for a half hour or so and then had dinner in
22 San Jacinto. The three of us were all concerned about our
23 spouses, as we knew they would be told that we had "turned, and
24 that they should make us come back or "disconnect" (a Scientology
25 term which means to sever all relationships with a person). After
26 we ate, Mr. Prince took me to a store to buy some clothing, as all
27 I had was the worn out and ragged clothes that I was wearing.

28 20. I then got a motel room in Hemet, California. Mr.

1 Bush and Mr. Prince got a room in another motel down the street.
2 Mr. Prince informed me that he was going to call Mr. Miscavige to
3 demand that his and Mr. Bush's wife be brought to them. I told
4 Mr. Prince not to tell them where I was and to tell them that I
5 would not discuss anything until I heard from my husband and that
6 Mr. Miscavige was to let Mr. Prince know how and when I could talk
7 to him.

8 21. Mr. Prince returned in a few hours relating that he
9 had called the Scientologists and they had brought his and
10 Mr. Bush's wife out to see them. He told me that their wives told
11 them they would divorce Mr. Prince and Mr. Bush if they did not
12 return to the Rehabilitation Project Force. He said the wives
13 then returned to Gilman Hot Springs and left Mr. Prince and Mr.
14 Bush at the motel.

15 22. Mr. Prince told me the Scientologists had told him
16 they would have my husband get in touch with me right away if I
17 would come to the motel where Mr. Prince and Mr. Bush were
18 staying. I moved to that motel to a room which they had reserved
19 for me. I slept there that night and waited for my husband to
20 arrive.

21 23. My husband did not arrive. So the next morning I
22 called the two ranches where I thought he might be (San Luis
23 Obispo and Newberry Springs). Both places informed me that
24 Richard was not there and they did not know where he was.

25 24. Shortly after making that call, I looked out the
26 window of the motel room and saw persons whom I recognized as
27 Scientology security guards wearing civilian clothes. They were
28 posted at various spots around the motel. Seeing this, I felt

1 that it was impossible for me to escape. Besides, I did not want
2 to leave until I had made contact with my husband.

3 25. A little before noon on April 1, my husband
4 arrived. He informed me that he had been up most of the night
5 with Mr. Miscavige and others, telling him that I had gone insane
6 and he should divorce me if he could not force me to return. We
7 discussed our situation and agreed that we would cooperate with
8 all their security checking and signing of documents so that we
9 could get away without being declared fair game. From my
10 experience as a staff member with the Scientology organizations, I
11 knew that they would not let us leave until such time as we
12 complied with their various requirements.

13 26. At this time, the Scientologists had all of our
14 worldly possessions, including a pickup truck, a horse, and two
15 dogs, as well as clothing and other personal effects.

16 27. On approximately April 2nd or 3rd, my husband took
17 me to see Dr. Megan Shields (a doctor whom I knew to be associated
18 with Scientology) in Los Angeles. Dr. Shields prescribed some
19 antibiotics for my illness. We were followed by someone from
20 Scientology when we traveled to Los Angeles and when we returned.
21 At this time, Scientology still held our personal possessions,
22 including the dogs and horse.

23 28. The process of "security checking" continued daily.
24 It went on for several hours a day. During this time, we were
25 submitted to intensive interrogation and required to be connected
26 to the "E-Meter," a device which purportedly measures a person's
27 truthfulness. The interrogation continued until April 8, 1987.

28 29. At the completion of the interrogation,

1 Mr. Miscavige came to the motel where we were being interrogated,
2 along with Mr. Mithoff and Mr. Rathbun. Mr. Miscavige asked us
3 regarding our plans and how much money we had. My husband told
4 Mr. Miscavige that we had a couple of thousand dollars.
5 Mr. Miscavige stated that he was concerned we might stay in
6 California where we would be easily available to subpoenas in
7 litigation in which Scientology was involved, or where we would be
8 susceptible to contact by "enemies" of Scientology. Mr. Miscavige
9 asked how much money it would take for us to move back to Texas
10 and get started in some type of business. My husband stated he
11 wasn't sure since it had been 15 years since he had lived as a
12 "normal" person, but he thought it would take about \$5,000. He
13 stated that we would manage somehow on the money we had (our main
14 concern was getting away). Mr. Miscavige offered to loan us
15 \$20,000 if we would go back to Texas.

16 30. On April 9, 1987 Mr. Rathbun and Mr. Mithoff
17 returned with a notary public and two attorneys, Mr. Larry Heller
18 and Mr. John Peterson. We were required to sign a stack of
19 documents. From my previous experience with Scientology, I knew
20 they were all the usual "standard" waivers, as no one is allowed
21 to leave the cult without signing them. Mr. Peterson and
22 Mr. Heller informed us that we could "consult" with him if we
23 wished to do so concerning the documents we were signing. I knew
24 that these attorneys had represented Scientology organizations and
25 that there was no way they would advise us regarding our best
26 interests.

27 31. The last document to be signed was a loan agreement
28 for \$20,000. Once we signed that, we were given a check for

1 \$20,000. We were then allowed to go downstairs to the parking lot
2 where a security guard had transported our belongings. Mr.
3 Miscavige had informed us the night before that since we had no
4 money, he would have Scientology buy our horse for \$1,500.00 so
5 that we would be able to leave the state "right away" rather than
6 wait around and try to sell the horse. We did not have the money
7 to move the horse to Texas. At this point, we got our two dogs
8 back and our belongings, and we left for Texas.

9 32. In 1981, when I was in the "U.S. Guardian's Office"
10 and had become familiar with the documents that had been seized by
11 the F.B.I. from the Scientology Cult in 1977, I became aware that
12 Scientology was capable of physical violence. I had heard stories
13 of it before, but had no first-hand knowledge. Once I saw these
14 documents (containing, among other things, evidence of operations
15 done on Paulette Cooper, Gabe Cazares, and others), I knew that
16 the end of "protecting Scientology" would justify any means.

17 33. In 1982, I witnessed David Miscavige (with a large
18 male ~~security guard~~ ^{Antz member} there to back him up) physically attack three
19 people who were incarcerated at Gilman Hot Springs. Mr. Miscavige
20 made them stand there while he hit them in the face.
21 Mr. Miscavige told me on more than one occasion how he had
22 physically attacked a female who was a fellow "Commodore's
23 Messenger" in 1981. He said he beat her up and threw her off
24 post. On another occasion, Mr. Miscavige called me out of his
25 office. He had a revolver in his hand, and stated he was very
26 angry with the "Golden Era Musicians," as they had not handled
27 some of the music on an album properly. He had a copy of the
28 album cover in his hand. He spread open the album cover to show

1 the pictures of the musicians. He said he would like to be able
2 to shoot the musicians, but could not. So instead he was going to
3 put a bullet in their heads in the picture. He then proceeded to
4 shoot the picture of each of them in the head. On another
5 occasion, Mr. Miscavige expressed fantasies about shooting Michael
6 Flynn, an attorney who had claims against Scientology, with his
7 rifle.

8 34. The first time Mr. Miscavige told me he was going
9 to "blow my head off," I had walked into his office by mistake.
10 This was at Gilman Hot Springs, where I had just arrived to become
11 part of the staff of Religious Technology Center. I was very
12 shocked and did not know how to take it. The second time he told
13 me he was going to blow my head off was when he thought I had sent
14 up an unfavorable report on his wife and upset her. The last time
15 he made such a statement was when he sent me to the rehabilitation
16 Project Force. Even though he was not aiming the gun at my head
17 when he said it, from the prior incidents that I had witnessed and
18 the prior statements that he had made, I felt he was capable of,
19 and indeed obsessed with, committing acts of physical violence
20 against others.

21 35. In late 1981, L. Ron Hubbard sent down an order
22 that was several pages long, setting forth how he wanted the
23 corporate structure of Scientology re-arranged due to legal
24 threats from criminal, civil, and IRS litigation. Prior to this
25 time, the mother church and the corporation that held the majority
26 of the Scientology assets was Church of Scientology of California
27 (CSC). CSC also held the Guardian's Office. CSC was at that time
28 named in many civil lawsuits as the defendant. Hubbard's strategy

1 was to reorganize this corporate set-up and create a new
2 corporation to be the mother church. This corporation was
3 created, and it was named Church of Scientology International.
4 CSC was stripped of all assets and moved to a small office across
5 the street from the Cedars of Lebanon complex. The majority of
6 the cash was placed in overseas trusts in order to avoid the IRS.
7 The people who controlled these trusts were Mr. Miscavige and Mr.
8 Spurlock. The money was set up to flow from the various churches
9 in the U.S. and elsewhere to these trusts. The theory for this,
10 as I understood it from Mr. Spurlock, was that the money was being
11 held in trust for Scientology parishioners. While I did not
12 personally work on setting up the corporate structures or money
13 flows, I was privy to the overall picture of the corporate
14 reorganization of Scientology organizations in my capacity as
15 President of Religious Technology Center and Guardian Office
16 Missionaire.

17 36. In 1982, my husband Richard was sent to the
18 Rehabilitation Project Force in Los Angeles. At that time I was
19 working in Gilman Hot Springs. These are about 70 miles apart.
20 During this period of time I had no time off and had to work every
21 day, all day, and many times, all day and all night.
22 Mr. Miscavige was my senior. He told me he did not want me going
23 to see Richard, as he was supposed to be isolated. At that time
24 there was another person at Gilman Hot Springs whose wife was in
25 the Rehabilitation Project Force in Los Angeles. He was told not
26 to see her either. He secretly went to see her one night and was
27 caught. Because of this, he was stripped of his status as a
28 "Commodores Messenger." His wife was then assigned to an ever

Contradicts
Depo
testimony

1 more intense level of rehabilitation until she agreed to divorce
2 him, and he was then declared a "suppressive person."

3 37. During this period, I would drive to Los Angeles
4 during the middle of the night once a week when Mr. Miscavige
5 would be away from Gilman Hot Springs. I would return to Gilman
6 Hot Springs in time to go to work the next morning so no one knew
7 that I was leaving. I knew from seeing what had happened to the
8 other person, that a similar fate awaited me if I was caught.

9 38. During the period from December, 1985 to
10 April, 1987, I had only limited contact with my husband. In
11 December, 1985 he was sent away. From that time through the
12 middle of January, 1986 I had no contact whatsoever with him and
13 did not know where he was.

14 39. For the period from mid-January, 1986 through
15 April, 1987 I had occasional contact with my husband. Even during
16 that time, the contact was not as frequent as we wanted. In
17 addition to the lack of frequency, I was never sure of his
18 location and had limited opportunities to have both physical
19 contact with him and opportunities for intimate conversational
20 exchanges where we could renew and sustain our relationship as
21 husband and wife.

22 40. Even after we were physically reunited, on or about
23 April 1, 1987, we were subjected to long periods of interrogation
24 by members of the Scientology Cult. In the confined circumstances
25 of this interrogation, I felt that we could not have the kind of
26 closeness and intimacy that would give me the support and comfort
27 that I needed and wanted from my husband.

28 41. During the period from October, 1981 to April, 1987

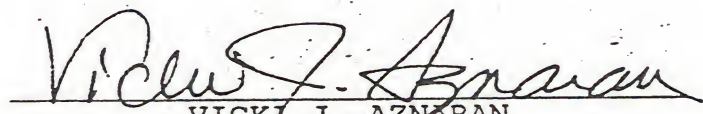
1 I worked for the cult in California. Although I may have traveled
2 outside of California on occasion, California was my residence and
3 the place to which I would return. During this period, I was a
4 staff member of the Scientology Cult. I worked many hours a day,
5 and far in excess of 40 hours per week. Although I did receive
6 some services in exchange for my work, I was never paid a minimum
7 wage for the work and overtime work that I performed for the cult
8 while in California.

9 42. In late 1982 the "Team Member System" was created
10 by L. Ron Hubbard in an effort to control staff of the Scientology
11 Cult. This was a system whereby a staff member was given five
12 laminated cards, and as the member committed various offenses,
13 cards were arbitrarily taken away. These cards represented
14 privileges like a place to sleep and food to eat and monetary pay.
15 As these are taken away, a person could end up sleeping out on the
16 ground with no food. This happened to several people while I was
17 at Gilman Hot Springs. I personally did not end up sleeping on
18 the ground as a result of this system.

19 43. If sworn as a witness, I could competently testify
20 to the matters stated in this Declaration.

21 I declare under penalty of perjury that the foregoing is
22 true and correct.

23 Executed this 23rd day of September, 1988 at Dallas,
24 Texas.

25 
26 VICKI J. AZNARAN
27 Declarant
28

1 PROOF OF SERVICE BY MAIL
2 (Declaration)
3 (C.C.P. 1013a and 2015.5)

4 I, Lisa M. Dunbar, declare:

5 I am employed in the County of Los Angeles, State of
6 California. I am over the age of 18 and not a party to the within
7 action. My business address is 1600 Wilshire Boulevard, Suite
8 300, Los Angeles, California 90017-1695.

9 On September 30, 1988, I served an AMENDED DECLARATION OF
10 VICKI J. AZNARAN IN OPPOSITION TO PLAINTIFFS' MOTION FOR SANCTIONS
11 on concerned parties in this action by placing a true copy thereof
12 enclosed in a sealed envelope with postage thereon fully prepaid
13 in the United States mail at Los Angeles, California, addressed as
14 follows:

15 Please see attached service list.

16 I declare under penalty of perjury under the laws of the
17 State of California that the foregoing is true and correct.

18 Executed on September 30, 1988, at Los Angeles, California.
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20 Lisa M. Dunbar
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AZNARAN v. SCIENTOLOGY

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